

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 13, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs respectfully write with an administrative request for a fresh order from the Court to facilitate efficient filing of (and public access to) certain exhibits listed on Plaintiffs' recent "Schedule of Judicial Documents cleared for Public Filing," ECF No. 9885-1.

As Plaintiffs set forth in their June 7, 2024 letter to Hon. Judge Daniels, Plaintiffs are continuing to file publicly (with redactions where appropriate) the judicial documents as to which the meet-and-confer process with all parties has been completed. ECF No. 9885 at 3-4.

Plaintiffs' exhibits include digital media files, such as videos, in formats and file sizes that the ECF is unable to accept. Based on consultations with Your Honor's (and Hon. Judge Daniels') Chambers, as well as with the relevant clerks at the courthouse, Plaintiffs respectfully request the Court's approval to file exhibits that comprise digital media files on DVDs. A scanned imprint of each DVD will be filed on the public docket via ECF, while the physical DVD will be deposited with the Records Management Office.

At the request of the records clerks, and to avoid an unrealistic burden of having to reproduce files from DVDs for members of the public, Plaintiffs respectfully agree to make available copies of all publicly filed DVDs upon request – either by means of duplicate DVDs, or in due course by posting the digital files on a dedicated Sharefile or weblink for download. Plaintiffs will provide counsel's contact information for this purpose when filing the DVD on the ECF.

The Court has previously authorized Plaintiffs on several occasions to file Exhibits (under seal) with the Clerk of the Court via CD, DVD, or USB-enabled hard drive, ECF Nos. 9479, 9520, 9619 and 9686. As a practical matter, the clerks have indicated they are prepared to accept DVDs filed by the process described herein. Plaintiffs thank the Court for its attention to this request.

The Honorable Sarah Netburn
June 13, 2024
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Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter@cozen.com
For the Plaintiffs' Exec. Committees

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe
ROBERT T. HAEFELE
MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhaefe@motleyrice.com
For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF